

Appendix

NOTICE OF VIOLATION

Iowa Electric Light and
Power Company

Docket No. 50-331

As a result of the inspection conducted on July 19-22, 1982, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violations were identified:

1. 10 CFR 50.55a(g) requires the licensee to establish an inservice test program. The licensee's inservice test program states that inservice testing of pumps and valves will be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code, 1980 edition and addenda through Winter of 1980.

Contrary to the above:

- a. inservice testing of the High Pressure Coolant Injection and Reactor Core Isolation Cooling pumps did not include the establishment of reference speeds as required by Paragraph IWP-3100 of the ASME Code, Section XI.
- b. Testing of all pumps included in the licensee's inservice test program did not include throttling the pumps to the reference differential pressure or reference flowrate prior to taking inservice test data as required by Paragraph IWP-3100 of the ASME Code, Section XI.

This is a Severity Level IV violation (Supplement I).

2. 10 CFR 50.55a(g) requires the licensee to establish an inservice test program. The licensee's inservice test program states that inservice testing of pumps and valves will be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code, 1980 edition and addenda through Winter of 1980.

Contrary to the above, numerous inservice test instruments did not meet the range requirements specified in Paragraph IWP-4120 of the ASME Code, Section XI.

This is a Severity Level IV violation (Supplement I).

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3. 10 CFR 50, Appendix B, Criterion XI, "Test Control" states in part: "A test program shall be established to assure that all testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents. Test results shall be documented and evaluated to assure that test requirements have been satisfied."

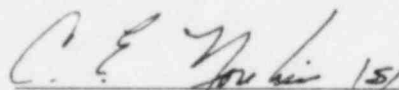
Duane Arnold Energy Center Procedure QAP 1303.1, Section 5.4.1.1 states that "Specific work procedures for...testing shall be developed and documented by the organization(s) performing the activities, for the implementation of a design change."

Contrary to the above, preoperational testing of the self-cleaning continuous backwash strainers added to the RHRSW system under Design Change Request 760 did not include determination of whether or not required head and flow could be delivered to the RHRSW system with the strainer backwash in operation. This had been established as a design requirement.

This is a Severity Level IV violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within thirty days of the date of this Notice a written statement or explanation in reply, including for each item of noncompliance: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

OCT 07 1982

Dated

C. E. Norelius, Director
Division of Engineering and
Technical Programs